

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

IN RE:	§	Case No. 21-30107-CGB
PDG PRESTIGE, INC.	§	
Debtor	§	Chapter 7
LEGALIST DIP GP, LLC,	§	Adv. No. 23-03004
Plaintiff	§	
v.	§	
PDG PRESTIGE, INC., and MICHAEL	§	
DIXSON, INDIVIDUALLY	§	
Defendants	§	

MOTION TO SUBSTITUTE ATTORNEY FOR PDG PRESTIGE, INC.

This pleading requests relief that may be adverse to your interests.

If no timely response is filed within 14 days from the date of service, the relief requested herein may be granted without a hearing being held.

A timely response is necessary for a hearing to be held.

TO THE HONORABLE CHRISTOPHER BRADLEY, UNITED STATED BANKRUPTCY JUDGE:

Ronald Ingalls, Chapter 7 Trustee for PDG Prestige, Inc., files this Motion to Substitute Attorney for PDG Prestige, Inc., and would show the Court as follows:

1. The movant is Ronald Ingalls, Chapter 7 Trustee for PDG Prestige, Inc., which case was filed on February 15, 2021, in Chapter 11, and converted to Chapter 7 on July 13, 2023.

2. An Application to Employ Attorney has been filed in the main case as docket #288, on September 6, 2023. The Application seeks to employ the Law Office Ronald Ingalls as attorney for the Trustee. The Order Approving Employment of Attorney (docket #293) was entered on October 2, 2023.

3. Currently in this Adversary Proceeding, the Debtor is being represented by David

Lutz, who also represents the Debtor's principal, Michael Dixson. The Trustee believes he needs separate representation in this Adversary. The Trustee moves to substitute the Law Office of Ronald Ingalls as attorney for PDG Prestige, Inc.

4. The movant has consulted with David Lutz, who does not oppose this relief. The movant has consulted with Russell Mills, attorney for the Plaintiff, who raised no objections.

WHEREFORE PREMISES CONSIDERED, Ronald Ingalls, Chapter 7 Trustee, prays that the Law Office of Ronald Ingalls be substituted as the attorney for PDG Prestige, Inc., in this Adversary Proceeding, and for other just relief.

Respectfully submitted,

/s/ Ronald Ingalls
Ronald Ingalls
SBT 10391900
Law Office of Ronald Ingalls
PO Box 2867
Fredericksburg, TX 78624
Tel: (830) 321-0878
Fax: (830) 321-0913
Email: ingallstrustee@gmail.com

ATTORNEY FOR CHAPTER 7 TRUSTEE

CERTIFICATE OF SERVICE

The signature above certifies that a true and correct copy of the foregoing document has been served by first class, U.S. mail, postage prepaid via the noticing center with service ordered on December 6, 2023, on those listed below:

PDG Prestige, Inc.
12912 Hill Country Blvd Ste F235
Bee Cave, TX 78738

United States Trustee - EP12
615 E Houston Ste 533
San Antonio, TX 78205-2055

Russell Mills, Gwen Walraven
Bell Nunnally & Martin LLP
2323 Ross Avenue, Suite 1900
Dallas, TX 75201

David P. Lutz
Martin & Lutz PC
PO Drawer 1837
Las Cruces, NM 88004